

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PRASANNA KUMAR VEMULA, and )  
NISHA SHIVRAMBHAI CHAUDHARI, )

Plaintiffs, )

v. )

Case No. 25-cv-04561

KRISTI NOEM, Secretary, Department of )  
Homeland Security; TODD LYONS, Acting )  
Director of the Immigration and Customs )  
Enforcement, each in their official capacity and )  
not individually; and UNITED STATES )  
DEPARTMENT OF HOMELAND SECURITY, )

Defendants. )

**PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER**

Plaintiffs, Prasanna Kumar Vemula, and Nisha Shivrambhai Chaudhari, through their counsel, move for the entry of an order granting a preliminary injunction and temporary restraining order, restraining Defendants, Kristi Noem, Secretary, Department of Homeland Security, Todd Lyons, Acting Director of Immigration and Customs Enforcement (each in their official capacity) and United States Department of Homeland Security (i) from terminating Plaintiffs' F-1 student status under the SEVIS [Student and Exchange Visitor] system, and (ii) requiring Defendants to set aside their termination determination.

Plaintiffs are aware of news reports regarding the possibility of the restoration of terminated SEVIS records which reports have occurred during the drafting and filing of this motion. Plaintiffs nonetheless require immediate action in this matter, as Plaintiff Vemula is to begin employment on May 1, 2025, and cannot work under his current status; and Plaintiff

Chaudhari is scheduled to graduate shortly thereafter.

Plaintiffs ask that the Court waive any requirement that Plaintiff give security pursuant to Fed. R. Civ. P. 65(c).

Plaintiffs' supporting Memorandum and supporting materials are submitted contemporaneously with this motion.

DATED: April 25, 2025

Respectfully submitted,

/s/ Jeffrey Grant Brown  
Jeffrey Grant Brown  
Attorney for Plaintiffs

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